

AUSA Assigned: JCK
Re: *Criminal Complaint Matthew Sturgeon*
County: Spokane

AFFIDAVIT

STATE OF WASHINGTON)
) ss
County of Spokane)

Brad Richmond, being first duly sworn on oath, deposes and states:

I. Affidavit in Support of Criminal Complaint

A. Probable Cause:

1. On August 14, 2015, a Confidential Human Source (*hereinafter*, CHS)¹

reported to members of the Spokane Regional Safe Streets Task Force that an individual identified by the CHS as **Matthew Sturgeon**, (a white male (DOB:

1 The CHS was indicted in U.S. District Court on narcotics allegations and has since
pleaded guilty and is cooperating in exchange for consideration towards an
upcoming sentencing hearing. Whenever possible, information provided by the
CHS has been independently corroborated and found to be accurate and
truthful. The CHS has three prior felony convictions which span the last ten years,
for drug possession/conspiracy and for operating a motor vehicle without
permission. Separately, the DEA received information from an anonymous source
who reported that the CHS was distributing cocaine; however, that information has
not been substantiated and/or corroborated.

02/21/88) aka: *Trouble*), and residing/working at 1302 W. Boone in Spokane, Washington, was selling methamphetamine for \$500 dollars an ounce. The CHS positively identified Matthew Sturgeon from a previous arrest booking photo. The CHS has personally witnessed Sturgeon sell methamphetamine to at least four (4) separate individuals.

2. Local law enforcement database checks revealed that Sturgeon has seven (7) prior felony convictions, including firearm possession, assault, domestic violence, and a conviction for manufacture/delivery of a controlled substance.

B. Controlled Buy:

3. On August 20, 2015, based on the information provided by the CHS, the Spokane Regional Safe Streets Task Force conducted a controlled purchase of methamphetamine from Matthew Sturgeon at his residence/business/garage, located at 1302 W. Boone in Spokane, Washington.

4. The Spokane Regional Safe Streets Task Force is a multi-agency federally funded FBI Safe Streets Task Force which is comprised of police officers, agents, detectives, and representatives from the Spokane County Sheriff's Office, Spokane Police Department, Washington State Patrol, United States Border Patrol, the Federal Bureau of Investigation, and the Washington State Department of

Corrections. *I AM A COMMISSIONED OFFICER WITH THE COURTHOUSE OR SPOKANE AND A FEDERALLY DEPUTIZED TASK FORCE OFFICER WITH THE FEDERAL BUREAU OF INVESTIGATION AND AUTHORIZED TO ARREST FOR FEDERAL WARRANTS.*

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(BR) (JP)

5. Surveillance units were in place before and after this controlled transaction. The CHS was searched and found to have no unauthorized controlled substances, money, or contraband on his/her person. The CHS was issued pre-recorded US currency and a body wire recorder. The CHS' vehicle was searched as well and was found to have no unauthorized controlled substances, monies or contraband.

6. The CHS was continuously followed from the pre-controlled buy meeting location to Sturgeon's residence/business/garage located 1302 W. Boone in Spokane, Washington. The CHS entered this location and purchased methamphetamine from Sturgeon.

7. The CHS was followed away from the 1302 W. Boone in Spokane, Washington, address to a pre-determined location where the CHS was under constant surveillance. Your Affiant made contact with the CHS. Your Affiant took custody of the controlled substance that the CHS had purchased from Matthew Sturgeon and recovered the body wire recorder worn by the CHS during the controlled transaction.

8. The CHS' person and vehicle were searched and found to have no unauthorized controlled substances, contraband, or monies.

9. A debrief of the CHS was conducted. The CHS explained to your Affiant that once inside Sturgeon's residence/business/garage, Sturgeon provided the methamphetamine to the CHS in exchange for US Currency.

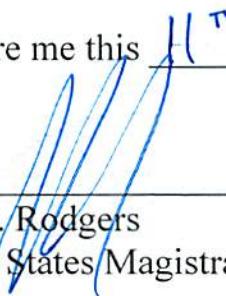
10. After this transaction, the methamphetamine purchased from Sturgeon was taken back to the FBI office and your Affiant and TFO Devin Presta processed this item as evidence. This item was field tested and the substance purchased from Sturgeon tested presumptive positive as containing the controlled substance methamphetamine. This item was then taken to Spokane Police property and lodged there as an exhibit.

C. Conclusion

Your Affiant submits that there is probable cause to believe that the individual named in this affidavit has distributed a controlled substance, specifically a substance containing methamphetamine, in the Eastern District of Washington, in violation of 21 U.S.C. § 841(a)(1).


Brad Richmond, Task Force Officer
Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me this 11th day of September, 2015.


John T. Rodgers
United States Magistrate Judge